



Modern Slavery Statement 2026

Legal

This statement is published pursuant to section 54(1) of the UK Modern Slavery Act 2015 and voluntarily disclosed in accordance with best practice, consistent with the principles of section 14 of the Australian Modern Slavery Act 2018 (Joint Modern Slavery Statements), and section 11 of the Canadian Fighting Against Forced Labor and Child Labor in Supply Chains Act 2023.

This statement constitutes the Modern Slavery Statement 2026 for The ERM International Group Limited and all its global subsidiaries, including those encompassing operations in the United Kingdom, Canada, and Australia. The complete list of ERM subsidiaries, which include ERM Worldwide Group Limited, Environmental Resources Management Limited, and ERM-Europe Limited, as of 31 March 2026, can be found on erm.com.

This statement should be read in conjunction with our previous Modern Slavery Statements, our Human Rights, Modern Slavery and Child Labor Policy, and wider corporate policies available to view at erm.com. This statement describes the specific action undertaken in the fiscal year 1 April 2025 to 31 March 2026 (FY26) and notes plans for the next fiscal year (FY27).

Consultation

Our policies, programs, and practices are applied globally, with each ERM entity subject to the same standards of conduct outlined in this statement.

We have consulted with the relevant entities that we own and control regarding this statement and our approach to human rights and modern slavery. This statement has been signed on behalf of all relevant ERM entities by the CEO.

A full list of ERM entities can be found on erm.com.

The ERM International Group Limited Company registration no: 13391605.

CEO Foreword



Sabine Hoefnagel
*Interim Chief Executive Officer,
ERM*

At ERM, we are committed to conducting our business with integrity, transparency, and respect for human rights. Modern slavery and human trafficking are grave violations of fundamental human dignity, and we have zero tolerance for such practices in any part of our operations or value chain. We reaffirm this commitment in recognition of individual and collective responsibility to respect and promote human rights, consistent with the UN Declaration on Human Rights, UN Guiding Principles on Business and Human Rights, International Labor Organization principles and Fundamental Rights at Work, and the UN Sustainable Development Goals.

As a global sustainability consultancy, we recognise both our responsibility and our opportunity to drive positive change. We work across diverse sectors and geographies, and we are steadfast in ensuring that our own practices, and those of our suppliers and partners, align with the highest ethical standards. Embedding respect for human rights into our business is integral to how we can deliver sustainable outcomes for our clients and society.

Throughout FY26, we have continued to strengthen our approach to identifying and managing modern slavery risks. This includes enhancing our due diligence processes, reinforcing our supplier expectations through our Supplier Code of Conduct, and expanding training and awareness across our organization. We have also launched our Supplier Portal, strengthening our process for assessing risk throughout our supply chain.

We recognise that addressing modern slavery is an ongoing effort that requires vigilance, collaboration, and continuous improvement. We remain committed to working with our clients and suppliers, and wider stakeholders to promote fair, safe, and respectful working conditions, and to help drive systemic change in the markets in which we operate.

THE REMAINDER OF THIS STATEMENT IS STRUCTURED AS FOLLOWS:

1. Our role and commitment	4
2. Organizational structure and supply chains	6
3. Corporate governance, policies, and risk management	12
4. Due diligence	16
5. Remediation	20
6. Training	23
7. Assessing effectiveness and FY27 priorities	25

Throughout this document we have signposted where further information can be found, key references include the [ERM Sustainability Report 2026](#) and [erm.com](#).

1

Our role and commitment

In this section we provide an overview of what modern slavery comprises and our commitment as a business to supporting the global challenge of eradicating modern slavery in its diverse forms.

What is modern slavery?

Modern slavery encompasses activities which involve the exploitation, coercion and control of individuals against their will. Individuals are subject to physical, psychological or economic forms of abuse and may be commoditized to be ‘sold’ or trafficked. Forms of modern slavery include human and sexual trafficking, forced labor, bonded labor, child labor, forced marriage and all forms of slavery-like practice ([Special Rapporteur on contemporary forms of slavery | OHCHR](#)).

Eradicating modern slavery is a global challenge which unites public and private sectors, organizations and individuals alike. We have a collective role to play in eradicating modern slavery and respecting human rights.

Recognizing the diverse forms of modern slavery
Trafficking of people for sexual and economic exploitation, including children
Bonded labor including debt bondage
Domestic servitude
Forced labor
Child labor
Forced marriage

Our commitment

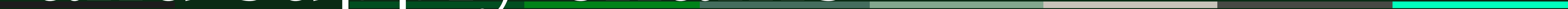
As the world’s largest advisory firm focused solely on sustainability, ERM works with organizations across the world who share our vision of eradicating modern slavery in all its forms.

The [ERM Human Rights Strategy 2024-2027](#) reaffirms our commitment to respecting and promoting human rights for all and operating consistently with the UN Declaration of Human Rights, UN Guiding Principles on Business and Human Rights, and International Labor Organization (ILO) Declaration on Fundamental Principles and Rights at Work.

We demonstrate our commitment to the UN Sustainable Development Goals (SDGs) by aligning to SDG 8.7 and its commitment to: *Take immediate and effective measures to eradicate forced labor, end modern slavery and human trafficking and secure the prohibition and elimination of the worst forms of child labor, including recruitment and use of child soldiers, and by 2025 end child labor in all its forms.*

2

Organizational structure and supply chains



In this section we provide an overview of our value chain, from our direct operations through to our supply chain and partnerships.

Our operations

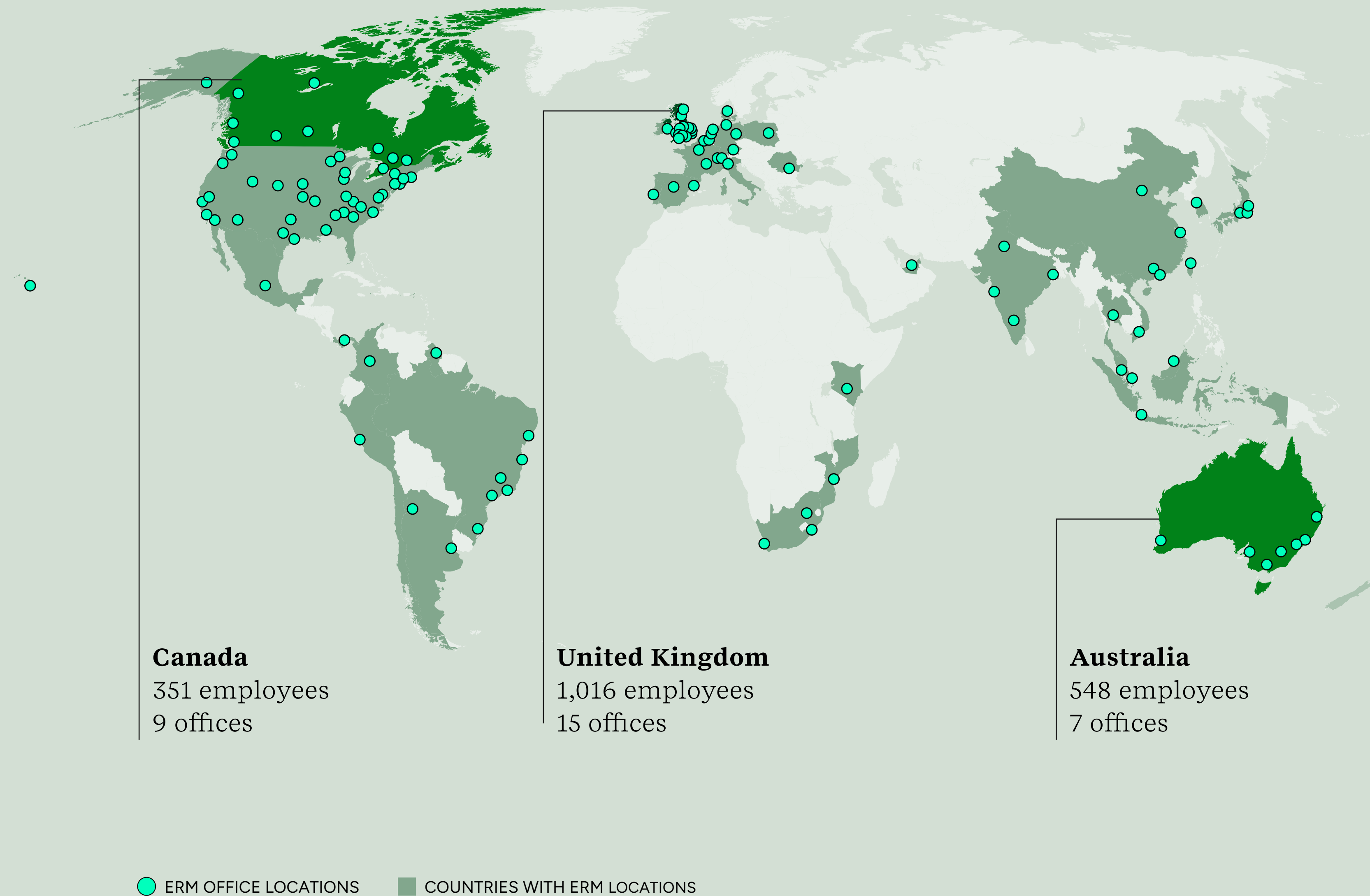
Underpinned by our purpose to shape a sustainable future with the world’s leading organizations, ERM’s diverse global teams of experts work with clients to support sustainable transformations, operationalize sustainability in our own business, and engage in strategic partnerships and collaborations.

Consistent with our approach to managing modern slavery risks, this statement addresses the breadth of our operations globally. The map highlights our operational presence globally, including the United Kingdom, Canada, and Australia which require modern slavery disclosures.

We operate primarily from over 120 offices, located in more than 38 countries and territories. We also conduct work from client offices and assets, and undertake field work to support our services to clients.

Our organizational structure is built around our partnership model, where ERM Partners are the shareholding managers and leaders of the firm. The ERM Board of Directors is responsible for the direction and oversight of The ERM International Group Limited (as parent company of the ERM Group) on behalf of its shareholders.

This statement encompasses the Group and all its subsidiaries globally. All subsidiary companies either carry out the principal activities of the Group, namely the provision of environmental, health, safety, risk, social, and sustainability consulting services, or are holding companies. Further information on our business structure is available on erm.com.



Our services and capabilities

We provide professional advisory services to companies and organizations around the world as they are responding to the ever-growing and evolving sustainability business imperatives. From meeting regulatory requirements to driving full-scale business transformation, we support clients at every stage of their sustainability journey.

For further information on our services, please refer to erm.com.

Our human rights capabilities

We have been a global provider of human rights, social, and environmental solutions for over 50 years and combine our global footprint with local expertise. ERM helps clients to positively contribute to their social license to operate and their shareholder value through: supporting clients to understand and manage human rights and modern slavery within their value chain; preventing or remediating negative impacts; and working with clients to go further to operate in a manner that respects and advances human rights.

We have a dedicated team based in key locations around the world, combining an intimate understanding of emerging international and national requirements with practical on-the-ground experience to support clients in understanding and fulfilling their human rights responsibilities. This helps protect access to capital, develop and maintain a social license to operate, and ensure regulatory compliance. Our multidisciplinary teams are at the forefront of human rights and environmental regulatory developments and support modern slavery due diligence, risk management, and reporting.



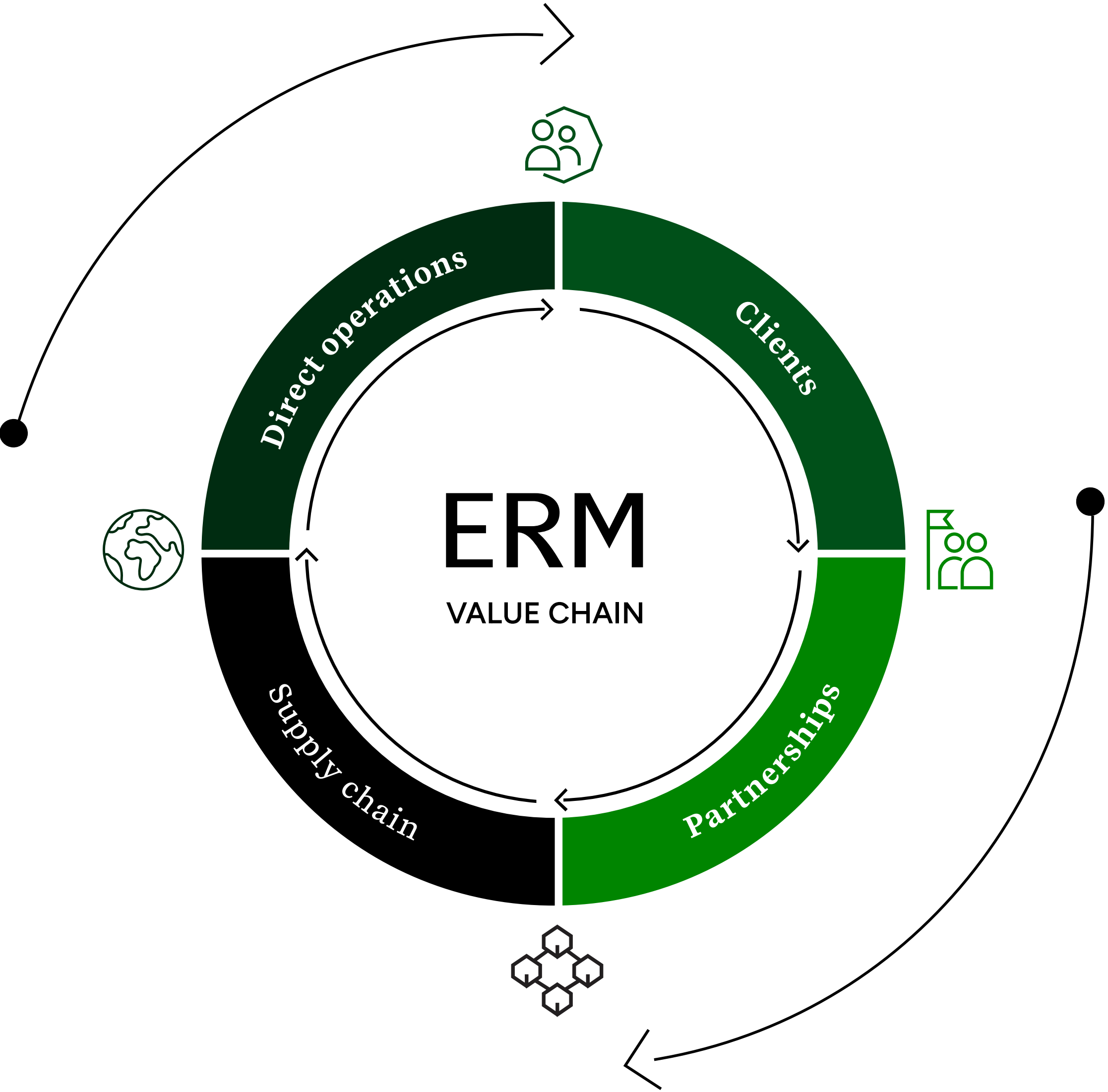
Our value chain

Across our value chain, we engage with our stakeholders including suppliers, clients, and business partners to proactively reduce the risk of modern slavery and support the protection of human rights.

UPSTREAM:
Creating value through our operations and supply chain

Our operations comprise the physical infrastructure, primarily offices, within which our employees work; the services we deliver in our offices and on-site; the materials we use to support our offices and the delivery of our work; and our investors who support the growth of our business.

Our supply chain comprises suppliers based in countries where we have offices and those where we have no direct operations but undertake projects on behalf of our clients. Our supply chain is diverse, reflecting the breadth of services we offer to clients and is aligned to our purpose and values. Further details on our supply chain can be found in [ERM's Sustainability Report 2026](#).



DOWNSTREAM:
Creating value through our work with clients and partnerships

Our clients and their supply chains are located and operate in countries across the world. During FY26, we worked on over 31,000 projects for clients in over 100 countries, across nine industries reflecting the global reach of our operations.

Our partners comprise industry and trade, professional, scientific, academic, and non-governmental bodies who share our purpose of shaping a sustainable future. In FY26 we worked with partners at a local, country, regional, and global level.

Our value chain also includes wider society and the socio-economic and physical environment within which we operate and seek to positively contribute to.

Our supply chain

The nature of ERM’s business as a professional advisory services company means that we use suppliers (including subcontractors) to support the delivery of our work. Our global supply chain spans the full reach of our offices and the countries in which we operate and additionally in countries where we deliver projects on behalf of clients but have no operational presence. Our top tier suppliers are primarily located in the United States, United Kingdom, and Australia reflecting the nature of our operations.

Our diverse supplier base is essential to our business and enables us to deliver seamless, high-quality services to our clients. We recognize that this is an area where the potential risk of modern slavery exists beyond our direct operational control and where we have the opportunity to use our influence to improve the management and performance of suppliers (including subcontractors).

ERM’s supply chain comprises:

Technical delivery support (direct suppliers)

Laboratory and analytical subcontractors

Technical subcontractors

Drilling subcontractors

Operational business support (indirect suppliers)

Software licensing

External consulting

Real estate services

Office supplies

Legal services

Travel expenses

Hospitality (including office catering)

Our supply chain is managed by our Group functions with procurement undertaken both centrally and across our operational offices, including through:

- Supplier procurement and management, which is led by our global functions including Legal, Finance, Operations and Sustainability and who work with our ERM Project Managers and Partners in supporting supplier selection.
- Goods and services procurement undertaken principally by our Group Operations and wider functions such as Legal and Digital, regional and office estate teams, typically through transactional purchases involving short-term contracts and one-off or annual purchases to support our global operations.
- Client project procurement of goods and services (including subcontractors) to support client project delivery is led by ERM Project Managers and Partners, who are best placed to identify project specific requirements and engage with commissioned suppliers throughout the duration of the project engagement.

The measures which we are undertaking in respect of our supply chain are set out later in this Statement and information on our broader approach to sustainable supply chain management is outlined in the the [ERM Sustainable Supply Chain Management Strategy 2024-2027](#).

Working with partner organizations

Partnerships

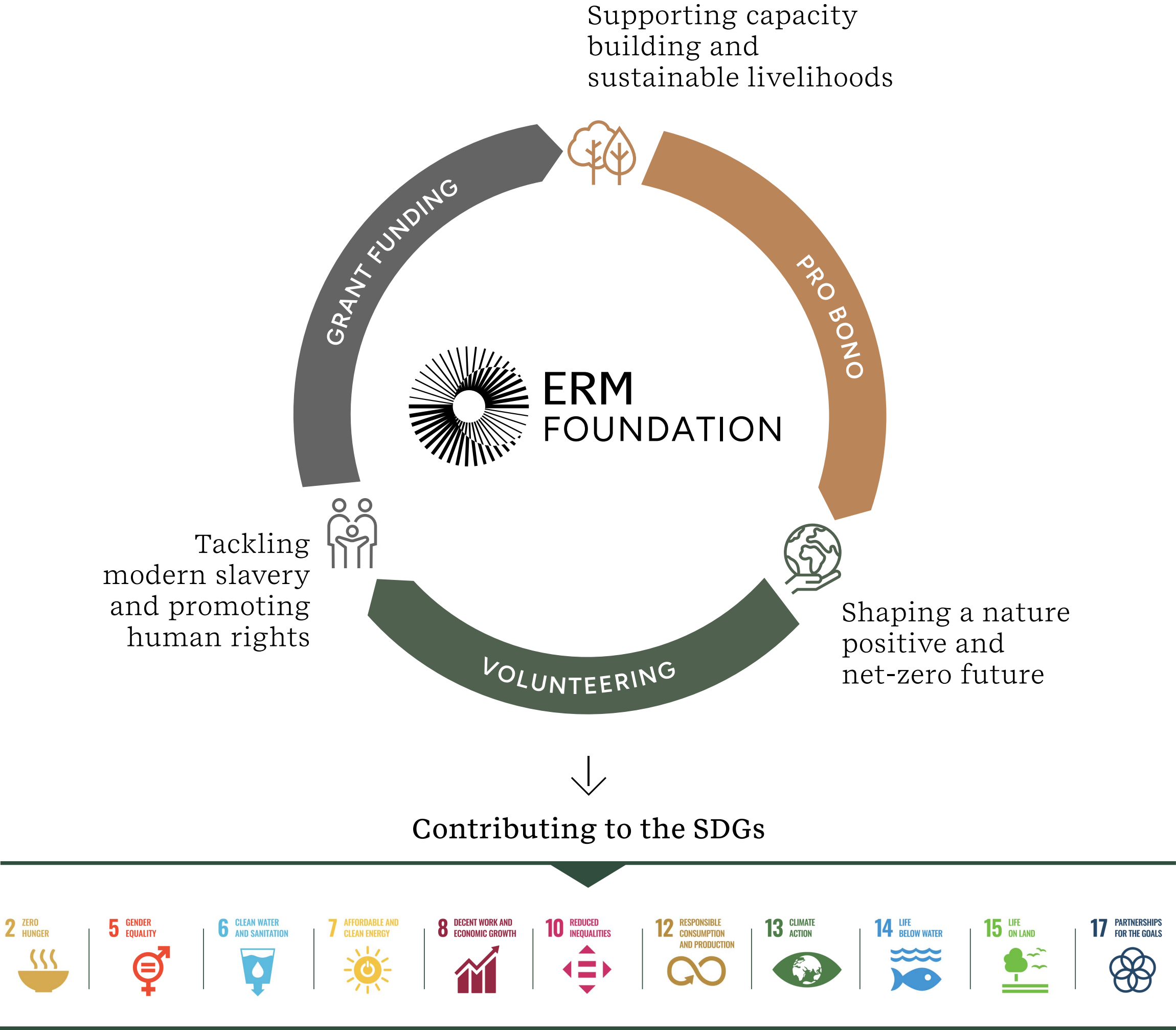
ERM has a range of strategic and commercial partnerships with organizations aligned with our purpose and strategy. These range from formal partnerships to membership of thematic or sector-based groups to support specific initiatives or activities.

The ERM Foundation

First established in 1995, the ERM Foundation works directly with social enterprises and nonprofit organizations. The Foundation is funded and supported by The ERM International Group Limited, with contributions from employee donations and fundraising across the 38 countries within which ERM is based. The Foundation is independent from the ERM business but shares the same beliefs and purpose of shaping a more sustainable future with the world’s leading organizations.

The ERM Foundation blends grant funding and technical pro bono support across three core areas, including human rights. During FY26, the ERM Foundation partnered with a range of organizations to empower excluded and disadvantaged communities, enhance livelihoods and support capacity building initiatives aimed towards eliminating the economic disempowerment that drives modern slavery. More information is published in the [ERM Foundation Annual Review](#).

16,500+
livelihoods supported
through the ERM
Foundation in FY26

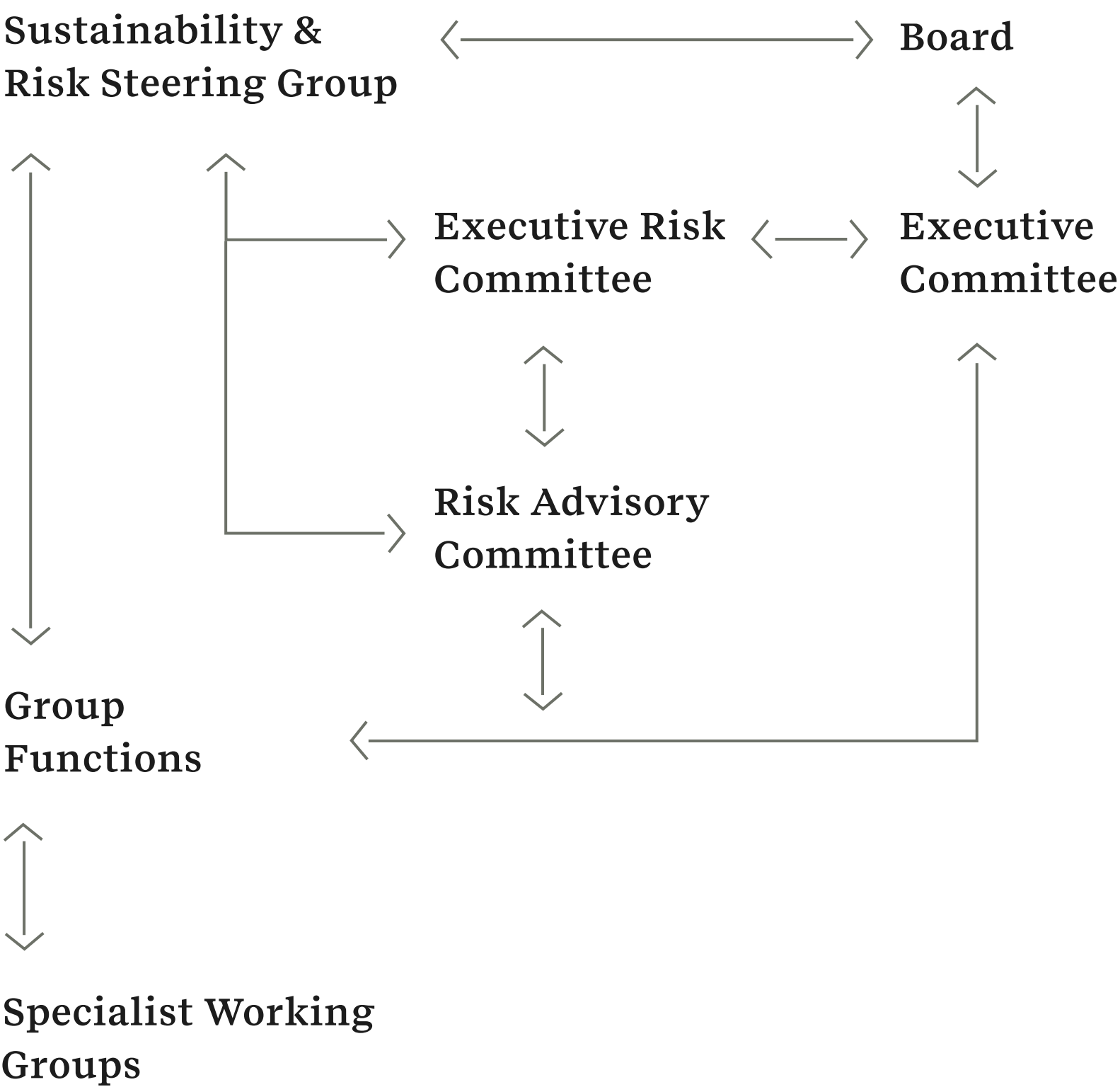


3

Corporate governance, policies, and risk management

In this section we set our approach to reducing the risk of modern slavery in our value chain through our corporate governance, risk management strategy, people, clients, offices, and supply chain management.

Our corporate governance



Leadership and accountability

The promotion of human rights and management of modern slavery risks is fundamental to ERM’s purpose and is led from the top by our CEO, collectively delivered through our Regional CEOs operational structure, and is a shared responsibility across our business.

The Board of Directors is ERM’s highest governing body. The ERM Board, hereafter referred to as ‘the Board’, is the highest authority and ultimately responsible for the strategic direction, governance, and oversight of The ERM International Group Limited (as parent company of the ERM Group) on behalf of its stakeholders. The Board has reviewed and formally approved this Statement.

The Executive Committee (ExCom) comprises four executive directors and a number of senior Partners in executive management roles who lead geographic, service, industry and client divisions of our operations, legal, people development, sustainability and risk, and other professional functions. ExCom is responsible for day-to-day management and accountability of business operations and meets to discuss performance regularly, ensuring key strategic responses to human rights-related risks and opportunities are being implemented effectively.

ERM Group Functions include Sustainability and Risk, Legal, Ethics and Compliance, People, Finance, and Operations. Each function is led by a Chief Officer or Global Head and their collective remit is to develop our corporate policies, priorities, and processes for implementation across our global operations.

ERM’s Global Head of Sustainability and Risk (GHSR) has overall accountability for our strategic approach to risk management, which includes those risks associated with modern slavery. Our GHSR is a member of ERM’s ExCom, co-chairs the Sustainability & Risk Steering Group and our Executive Risk Council.

Working with the Head of Risk, they are directly accountable for the company’s Enterprise Risk Management Program, which considers modern slavery risk within our wider scope of enterprise risk.

The GHSR is also accountable for the implementation of ERM’s Human Rights Strategy, which provides our global program of action to address modern slavery risk. This program is supported by key functional and operational leads, who will support the delivery of the ongoing evolution of our governance and management practices to manage modern slavery risk across our value chain.

Our GHSR works in conjunction with our General Counsel and Chief Ethics and Compliance Officer to oversee compliance with the UK Modern Slavery Act (2015), the Australian Modern Slavery Act (2018) and the Canadian Modern Slavery Act (2023). Their work is supported by our senior leaders, including the wider Group functional leads, our operational leads including Regional CEOs and Business Unit Managing Partners.

Policies

ERM has a suite of policies and strategies which set out the expectations, roles, and responsibilities of all employees to adhere to the highest standards of ethical conduct, in accordance with our stated commitments set out in section one. All employees are required to review and comply with our policies, as part of their annual mandatory training.

The development of policies is collaborative across the ERM Group Functions, including Sustainability and Legal, with each policy stating the period for when it applies, review dates, and whom the policy is formally approved by.

Our [Global Code of Business Conduct and Ethics](#) is available in 15 languages. Our Code sets out clear and unequivocal requirements for all employees to act in accordance with this, adhering to the highest ethical standards. We express our commitment to conducting business with uncompromising honesty and integrity through our business values, professional standards, employee training, and our internal systems and practices. The Code will be updated in FY27.

Our [Human Rights, Modern Slavery and Child Labor Policy](#) prohibits the use of child or forced labor in our own operations and that of our supply chain, and forbids any involvement by ERM with organizations that support prohibited labor practices or human trafficking. This policy works in conjunction with ERM’s purpose and beliefs and [Global Code of Business Conduct and Ethics](#). This policy will be updated in FY27.

[ERM’s Sustainability Policy](#) articulates our commitments to sustainability, including the social and economic development of communities, which can meaningfully contribute to combating modern slavery. The policy applies globally to all ERM entities and all ERM employees. This policy will be updated in FY27.

Specific to our supply chain

Our [Supplier Code of Business Conduct and Ethics](#) outlines our commitment to working with suppliers who have embedded sustainability, diversity, and ethical practices within their own organization and supply chain. It contains specific reference to labor and human rights and articulates that suppliers we work with must have public commitments and processes in place to prohibit slavery in all its forms across the supply chain and prohibit unlawful discrimination and harassment of workers. All suppliers and subcontractors must adhere to the Supplier Code.

Our [Sustainable Procurement Policy](#) details how we prioritize suppliers that comply with all laws in accordance with the principles of the ILO, UN Global Compact, and the UNDHR, in addition to wider sustainability, diversity, and ethical practices in their own organizations.

Across direct operations and suppliers

Our ‘Speak Up’ Whistleblower Policy is applicable to all ERM employees, subcontractors, suppliers, and wider stakeholders and encourages anyone to report any concerns, anonymously and without fear of retaliation, if someone is acting in a way that is not consistent with our Global Code of Business Conduct and Ethics or our Supplier Code of Business Conduct and Ethics, including modern slavery concerns.

More information on our grievance mechanisms is detailed in section five. Our wider policy framework and corporate governance disclosures are available on [erm.com](#) and detailed in the ERM Sustainability Report 2026.

Our framework of policies

- Global Code of Business Conduct and Ethics
- Human Rights, Modern Slavery and Child Labor Policy
- ERM’s Sustainability Policy
- Supplier Code of Business Conduct and Ethics
- Sustainable Procurement Policy
- ‘Speak Up’ Whistleblower Policy

Risk management

We continue to evolve our governance of risk in line with business need. During FY26, two new oversight bodies have been established to support the Sustainability and Risk Steering Group in strategically managing enterprise risks, including those risks associated with modern slavery.

The Sustainability and Risk Steering Group serves as an advisory group to the Board. It works in conjunction with the Board to oversee the identification and mitigation of risks relating to sustainability and reputation, including human rights and modern slavery risks.

The Executive Risk Council (ERC) ensures ERM’s strategic objectives and risk appetite remain aligned; provides additional focus on financial oversight reporting to/from our Audit Committee; and increases our assurance of the effectiveness of our enterprise risk management program and processes in maintaining our desired risk profile. The ERC consists of select Heads of Functions, including Legal, Finance, and Risk. It meets at least quarterly.

Risk Alignment Committee (RAC) has a key role in the strategic oversight of our risk management program and feeds into the ERC. It promotes coordination across risks with multiple interdependences, including climate, artificial intelligence, and quality management. The Committee includes key business functional leads who comprise second line governance, responsible for supporting and challenging first-line risk owners. First-line risk owners include those responsible for leading our people, operations, IT and systems, legal and regulatory matters, sustainability, and commercial functions. The RAC meets at least quarterly and escalates any issues as needed to the ERC.

Risk management processes

ERM’s enterprise risk management system has evolved to align closely with the Committee of Sponsoring Organizations of the Treadway Commission (COSO) framework which addresses control environment, risk assessment, information and communication, monitoring, and existing control activities. This includes the integration of material human rights issues into our risk management framework and our strategy.

ERM integrates an array of human, operational, financial, geopolitical, legal, and strategic issues into a common approach to identify, assess, and manage risks. Our Risk function supports our organization’s ability to deliver on our goals, anticipate risks, flow risk information to decision makers, proactively implement management strategies, and improve our stakeholders’ confidence and trust.

Our approach to identifying salient human rights risks and impacts enables ERM to assess risks at the local, business unit, regional, and company-wide levels. We consider risks across our operations and value chain, including our work with clients, subcontractors, suppliers, and the communities in which we operate.

We recognize the importance of reflecting the different priorities and challenges which different regions or geographies face, alongside the common driver of protecting and promoting human rights which unites us and our stakeholders globally.

To execute our vision, deliver on our growth ambitions, and meet the needs of stakeholders, our risk and sustainability programs are directly tied to each other in support of our

business strategy. The top sustainability issues identified through our materiality assessment, which include human rights, are considered alongside enterprise-level risks, which in turn inform our strategy and planning. Strategic risks, including human rights-related risks, are identified and assessed through our risk management processes and included in our risk register.

We implement a risk-based project screening requirement to help us identify more systemically the potential adverse human rights impacts of our work with clients, enabling us to take the appropriate measures to avoid causing, contributing or being linked to such impacts.

We consider geopolitical risk within the context of our business strategy and risk management program; and we consider the implications within our own operations as well as our work at the sector, client, and project levels.

We take care in forming business relationships so that we honor our standards of business conduct and ethics. We are required by various laws and regulations to undertake certain due diligence in relation to clients, subcontractors, suppliers and other third parties.

We comply with the applicable trade sanctions and anti-money laundering laws. To do this, ERM conducts a due diligence screening process to check our clients, contractors, suppliers, and other business relationships. ERM’s primary system for this compliance is integrated within our client relationship management (CRM) tool.

4

Due diligence

This section details our material modern slavery risks and our approach to the management of these issues, in particular, the management of modern slavery risk within our people, clients, offices, and supply chain.

ERM’s material risks and opportunities

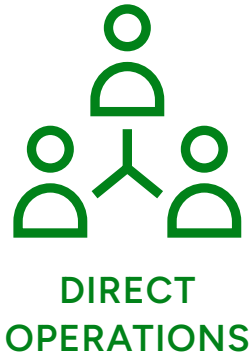
As set out in our previous Modern Slavery Statement, ERM conducted a review of our material modern slavery risks and opportunities, which led to the publication of [ERM’s Human Rights Strategy 2024-2027](#). The assessment was led by the Group Sustainability Team, with the input of wider Group functions, operational leadership and ERM’s own technical specialists in the field of human rights and modern slavery. This assessment is subject to regular review and the issues identified through our initial risk assessment remain material to us as a business.

During FY26, we continued to develop our understanding of where modern slavery risk exists within our operations. The primary focus in FY26 and continuing in FY27 is strengthening our due diligence procedures and visibility of potential risks. This will be complemented by a range of wider measures aligned to the management of our material risks.

Risks

There are a broad range of issues which require proactive management to ensure we respect and promote the rights of our employees. These include:

- Recruitment and compensation practices
- Modern slavery risk
- Health, safety, and wellbeing
- Labor rights
- Diversity, inclusion, and belonging



Risks and opportunities

- Ensuring our suppliers align with our values and objectives
- The impact of the delivery of our commissioned services on the communities in which they are delivered
- Visibility of potential violations of human rights including modern slavery risks

Risks and opportunities

- Ensuring our client and project opportunities align with our values and objectives
- Our services to clients to support their human rights management
- The impact of our client services on the communities in which they operate and wider society



Opportunities

- Ensuring those who we partner with align with our values and objectives
- Collaborations and thought leadership seeking to promote human rights
- The work of the ERM Foundation in supporting those suffering discrimination, disadvantage or exclusion in communities across the globe

Due diligence and management

Our direct operations

Human resources management

As a professional services company, people are our primary asset as a business and ERM has an extensive People function operating across our global business. The People function works to address breadth of our people-related topics in alignment with relevant labor laws, from recruitment and retention to employee management, health and wellbeing, and professional career development.

Recruitment

ERM both recruits directly through our People function, and through the use of screened and reputable recruitment agencies where specialist or specific geographical support is required. We will not use an agency which requires worker paid recruitment fees, withholds worker access to their documentation including passports or seeks to restrict access to remedy, compensation, and fair treatment.

Ethical standards and remedy

The ethical management of our people is fundamental to our purpose and values as a business. As set out in the previous section, we have a robust framework of policies and codes of conduct which must be adhered to. The ethical treatment of our employees, including access to remedy and fair treatment, is also a requirement for our suppliers and the treatment of their own employees.

Our clients

Commercial opportunities with clients are screened for potential sustainability risks, including human rights and modern slavery. Our sustainably transparent assessment of risk and reward (STARR) process is a first step prior to engagement with a client.

At the earliest possible time, an assessment of clients and opportunities is required to help make the right decision that is aligned with our strategy, purpose and values. Based on an assessment of available information and discussions with relevant stakeholders and decision makers – as facilitated by the Regional Risk Director – a preliminary go/no go decision will be made. For opportunities that receive preliminary approval to advance, commercial and project evaluation and a project risk review process continue throughout the project.

Once the STARR process is complete, ERM’s operational risk processes provide a globally consistent approach to managing our project risks that enables us to identify and mitigate the risks before project commencement or at significant change-in-scope events.

ERM has in place a Global Project Risk Review Policy to strengthen project risk management throughout the life cycle of significant projects. This policy, updated in FY26, applies where a project has material impact on the business, or project risks are material to the business, or a project failure could have material impact on the business. The process involves senior experienced business leaders and technical specialists supporting the team throughout the project.

ERM is continuing to expand our modern slavery due diligence as part of our project management protocols and requirements. This includes assessing the risk of modern slavery within our own employees, subcontractors or external stakeholders engaged in the delivery of the project, upon identification of the project opportunity, at commencement and during delivery of the project. Potential issues would be discussed with the client and relevant stakeholders, and appropriate mitigation would be required prior to commencement. The project would then be monitored on an ongoing basis. If the concerns cannot be mitigated, ERM does not proceed with the project or activity. During FY27, we will continue to evolve our project management protocols.

Due diligence and management of our supply chain

The nature of ERM’s business means that we commission services to support our operations and delivery of services to clients. This is an area where the potential for modern slavery exists beyond our direct operational control, especially in regions with elevated risks and client work with higher-risk industries. We have robust governance processes to proactively identify and mitigate potential risks, which support us in understanding the breadth of our direct and indirect suppliers globally.

Pre-screening of potential suppliers

We review the hiring practices of our higher-risk suppliers, from asking how they recruit employees to requesting records that verify they follow anti-trafficking efforts. This can include thorough background checks and efforts to confirm submitted documents. A high degree of due diligence is applied when engaging labor brokers, especially in high-risk jurisdictions. This will continue to remain a focus in FY27.

We contractually require suppliers to act in accordance with our Supplier Code of Business Conduct and Ethics (Supplier Code), which includes specific clauses around human rights and modern slavery and our broader Human Rights, Modern Slavery and Child Labor Policy. Our standard contractual terms and conditions bind suppliers to our Supplier Code and therefore provide explicit expectations and requirements with respect to addressing human rights, including modern slavery.

The Supplier Code consolidates updates on key international terms such as anti-bribery and corruption, human rights (including prohibitions for all forms of modern slavery), and our health and safety contractual requirements. Our standard subcontractor agreements and supplier-relationship management system were all updated with the Supplier Code as part of its implementation.

ERM’s Supplier Portal

In FY26, we launched our new Supplier Portal, introducing further due diligence, data, and reporting protocols for our top tier suppliers to provide for ongoing monitoring and review of their performance. Through the Portal, our suppliers are screened to ensure they maintain conformance with our policies and protocols. Any potential non-conformance will be subject to escalation.

In line with our commitment to implementing ethical and sustainable practices across our operations and supply chain, these suppliers are required to annually self-certify compliance with our policies and strategies, including:

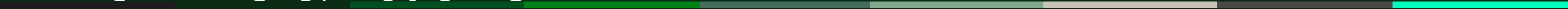
- Supplier Code of Conduct
- Sustainable Procurement Policy
- Sustainable Supply Chain Management Strategy
- Human Rights, Modern Slavery and Child Labor Policy
- Human Rights Strategy

Suppliers are now required to provide annual information on their strategic approach and management of human rights risk, including that of modern slavery, as part of an annual survey of strategic approaches and performance. Our focus for FY27 will remain on identifying and capitalizing upon opportunities to strengthen our procedures, enhance visibility, engage with additional suppliers, and reduce and mitigate risks, including modern slavery risks. We will also continue to onboard wider sections of our supply chain.

We encourage companies in our supply chain to promote transparency in their own supply chains. ERM will work with our suppliers to develop effective monitoring processes to stay alert to forced labor and other modern slavery and human trafficking risks. We commit to performing regular engagement with businesses along our supply chain to determine if their practices remain aligned to ERM’s ethical standards.

5

Remediation



In this section we provide an overview of the mechanisms and processes in place at ERM where employees, clients, suppliers, and the public can raise concerns.

Remediation

Introduction

During FY26, there were no reported incidents of modern slavery. This section details our approach to remediation in the event of an incident being reported and/or concerns raised.

Grievance mechanisms

ERM is committed to identifying and addressing adverse impacts on human rights and modern slavery.

We encourage all employees, clients, suppliers, and the public to raise ethical and legal concerns about the operations of ERM or its supply chain, including potential human rights concerns. We treat all concerns raised seriously and have a zero-tolerance approach to retaliation.

Process of spotting and reporting concern:



1. Identification

As previously referenced in this Statement, we have conducted an awareness campaign on recognizing the signs of modern slavery. The next stage in this campaign will begin in FY27 with the launch of an updated Modern Slavery training module which seeks to equip colleagues with an enhanced understanding and confidence in identifying common signs of modern slavery. A new series of communications across business units, offices, networks, and teams will be launched to accompany this.

2. Reporting mechanisms

ERM has established remedial mechanisms by which stakeholders can report concerns with respect to modern slavery, and through which we address behaviors and practices which we consider to be inconsistent with our Human Rights Policy. These include:

The ERM Speak Up Helpline

ERM’s key reporting and remedial mechanism is the [ERM Speak Up Helpline](#), which was implemented in 2018 and is a service hosted by a third-party. It is available 24 hours a day, 365 days a year, by a secure web portal or toll-free telephone line and supports dozens of languages. Concerns about our business operations and any other form of unethical business conduct can be reported confidentially, without fear of retaliation and anonymously to the extent permitted by law.

Project Management Model

In addition to the Speak Up Helpline, ERM has an established Project Management model, which ensures that all ERM work is led by a Partner in Charge (PiC) with the support of a Project Manager (PM). It is the responsibility of the PiC and PM to ensure that all projects are conducted in accordance with ERM’s policies and processes and pursuant to ERM’s purpose of being a sustainability leader. Should the Project Management Team have any concerns about the current or future direction of the project, they are required to report these to the client relationship manager, business unit leadership, and Legal Counsel, as appropriate.

Public concerns

Members of the public – individuals and communities – can communicate concerns or ask questions by emailing businessconduct@erm.com or through ERM’s Speak Up Helpline which is signposted in the ERM Sustainability Report and on erm.com.

3 And 4. Investigating and remedying

ERM is committed to investigating, addressing, and remedying where possible and appropriate all issues raised through our reporting mechanisms. Our protocol includes:

- Exploration of the issue or concern with the stakeholder who identified it (if known) and wider operational or project management team (if internal).
- If escalation is required, the relevant senior leadership in the business unit or region will be engaged, including Legal Counsel.
- Subject to the outcome of this engagement, the issue may be further escalated to regional and global Legal Counsel, including our Chief Ethics and Compliance Officer (CECO) and General Counsel (GC).
- As appropriate, the CECO and GC will report to ExCom on the issue of concern and any proposed remediation which has been identified during the course of investigation.
- Where the reported issue involves clients or client contractors and suppliers, the issue will be explored with the client and remedial measures identified. In the event that issues or concerns continue, and remedial measures are deemed not to have been effective, ERM will cease all activities related to the project or client operation.
- Where appropriate, ERM will engage third parties, including law enforcement stakeholders to investigate identified potential incidences of modern slavery.

We are committed to addressing any issues promptly but do not put time limits on the duration of time we will take to investigate issues and identify appropriate remedy. We will, however, maintain engagement with those involved during this time.

Remedy may include but is not limited to further mitigation measures integrated into project delivery, professional support for any affected individual affected and recourse to law enforcement agencies where required. We will enact further wider remedial measures as appropriate for the specific issue identified.

5. Review tracking and monitoring

We continue to learn more about modern slavery and human rights-related risks based on direct feedback from our operational and delivery teams. We incorporate this learning into the relevant risk management processes.

We remain committed to implementing effective monitoring and are continuing to work with clients, our supply chain, and across our operations to develop our framework.

6

Training

In this section we provide an overview of training provided to our employees and those of our suppliers.

Training

Approach to training

Modern slavery training forms part of our annual mandatory training for all employees, providing a vital mechanism by which to refresh understanding and awareness of modern slavery and the signs which colleagues should be alert to.

The delivery of our human rights and modern slavery risk management is the individual and collective responsibility of all employees at ERM. In FY26, we reviewed our mandatory human rights and modern slavery training module to reflect our evolving understanding of where and how risks of modern slavery exist and how we should manage these appropriately. This included focusing on the need for specialist guidance for subsets of our employee base, reflecting their operational role and responsibilities. Based on this analysis, we will be launching a new, expanded training course in FY27, as part of the ongoing evolution of our support for colleagues.

We encourage an open dialogue about modern slavery, both within our business and with our wider stakeholders. Through this we believe that our collective understanding of this challenging topic can be enhanced, and we both contribute to but also learn from the shared discussion. In support of this, we will be updating our communication campaign for all employees to be able to spot the signs of modern slavery during FY27 to ensure it continues to remain an ongoing feature across our offices.

Catered guidance and training for office leads

Our offices are run by our Operations and Facilities Teams, under the management of our business unit senior leadership. All office operations must adhere to our global management policies and protocols, including those pertaining to human rights and modern slavery, and additional training and guidance is made available to personnel in this role.

During FY26, we continued to focus on developing catered guidance to our office management staff to support their understanding of where and how risks of modern slavery may materialize within the operation of our offices across the globe and how best to manage these. This guidance will equip our office leads to engage all those involved in procuring services, maintaining our facilities, and engaging with personnel. The guidance will include clear signposting of our processes and protocols for reporting and escalating concerns, and information posters for wider publication in our offices. These updated resources are due to be communicated in FY27.

Catered training for supply chain

Through the ERM Supplier Portal, suppliers can access training developed by ERM to support the education and awareness of key topics, including identifying and reporting forms of modern slavery. During FY27, we will continue to expand and provide additional tailored training for different areas of our supply chain.

7

Assessing effectiveness and FY27 priorities

In this section we include an update on our FY26 performance, set out our targets and priorities for FY27, and provide information on our wider reporting.

Effectiveness of our FY26 performance

As noted in our FY25 Statement, we committed to undertaking specific actions in respect to our due diligence, training and communications, supply chain management, and our operations. We have included commentary on the effectiveness of our delivery against our targets.

During FY26, there were no reported incidents of modern slavery.

Performance against our FY26 targets is summarized below:

Component	Target	Performance
Training and communications	Roll out a campaign on raising awareness of modern slavery risk across our global operations, with targeted campaigns at key sections of our workforce.	Our communications and awareness campaign continued in FY26 and will remain ongoing during FY27. Our focus was and remains twofold: raising general awareness across our employee base and providing catered advice to address the specific responsibilities and circumstances which specific subsets of our employee’s encounter.
Supply chain	Continue engagement and further enhance our management of modern slavery risk across our supply chain, including through further data gathering and monitoring and active due diligence.	During FY26, the ERM Supplier Portal was launched, with new due diligence, self-certification and disclosure requirements on human rights and modern slavery risk management for those suppliers required to register on it.
Clients	Continue to embed social advisory work, including modern slavery, across our client services.	Our social advisory work continues to evolve with our specialist technical community supporting clients across our global operations. Examples of this work are showcased on erm.com and in the ERM Sustainability Report 2026 .
Partnerships	Continue to explore collaborative working with our partner organizations, to promote awareness and proactive management of modern slavery risk.	ERM remains a participant in the UN Global Compact, reflecting our ongoing commitment to engage with partner organizations to promote evolving practice in modern slavery risk management, and reporting.

Our priorities for FY27

We will continue to implement our program of action focused on evolving the governance and management of human rights and modern slavery across our value chain, as set out in our [Human Rights Strategy](#). Key actions have been highlighted throughout the preceding sections of this Statement and are summarized in the table.

We reaffirm and recommit our respect for human rights and a world free of slavery for all. In pursuit of this goal, we will make efforts that extend beyond our own immediate organizational interests. Alongside setting internal targets we will continue to participate in building external standards and providing education so that momentum builds beyond our own sphere of business influence, fully aligned with our purpose of shaping a more sustainable future with the world’s leading organizations.

Area	Target
Training and communications	• Further roll out the campaign on raising awareness of modern slavery risk across our global operations • Launch of updated Modern Slavery training • Publication of updated guidance on identifying and reporting signs of modern slavery
Supply Chain	• Continue to engage our supply base to enhance our management of modern slavery risk, including through further data gathering and monitoring • Launch new Modern Slavery training • Undertake active due diligence through the Supplier Portal
Clients	Continue to embed social advisory work, including modern slavery, across our client services, supporting their delivery against regulatory and emergent best practice requirements.
Partnerships	Continue to explore collaborative working with our partner organizations, to actively promote awareness and management of modern slavery risk.

Wider reporting

This Statement forms part of our ongoing commitment to transparent and accessible reporting for the benefit of all stakeholders and reflects our commitment to international efforts to abolish all forms of modern slavery. Our wider reporting on human rights issues, which includes modern slavery, includes:

- Annual disclosure of our approach and performance in relation to the protection and respect of human rights across our value chain, is set out in the [ERM Sustainability Report 2026](#).
- Our Sustainability Report and supplements provide snapshots of ERM's contribution to the SDGs throughout, with reference to our impact on Goal 8.7, which focuses on the eradication of all forms of modern slavery.
- Our progress in upholding the 10 principles of the UN Global Compact (UNGC) and the Women's Empowerment Principles are reported annually via the Communication on Progress which is published on the UNGC website.



Modern Slavery Statement 2026

Sustainability is our business

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